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12 *Attorneys for Plaintiff and the Class*

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
15

16 KEVIN RISTO, on behalf of himself and
17 all others similarly situated,

18 Plaintiff,

19 v.

20 SCREEN ACTORS GUILD-
21 AMERICAN FEDERATION OF
TELEVISION AND RADIO ARTISTS,
a Delaware corporation; AMERICAN
22 FEDERATION OF MUSICIANS OF
THE UNITED STATES AND
23 CANADA, a California nonprofit
corporation; RAYMOND M. HAIR, JR.,
24 an individual, as Trustee of the AFM and
SAG-AFTRA Intellectual Property
25 Rights Distribution Fund; TINO
GAGLIARDI, an individual, as Trustee
26 of the AFM and SAG-AFTRA
Intellectual Property Rights Distribution
27 Fund; DUNCAN CRABTREE-
IRELAND, an individual, as Trustee of
28 the AFM and SAG-AFTRA Intellectual

CASE NO. 2:18-CV-07241-CAS-PLA

CLASS ACTION

**NOTICE OF LODGING OF
PLAINTIFF'**

Judge: Hon. Christina A. Snyder
Crtrm.: 8D – 8th Floor

Trial Date: August 17, 2021

1 Property Rights Distribution Fund;
2 STEFANIE TAUB, an individual, as
3 Trustee of the AFM and SAG-AFTRA
4 Intellectual Property Rights Distribution
5 Fund; JON JOYCE, an individual, as
6 Trustee of the AFM and SAG-AFTRA
7 Intellectual Property Rights Distribution
8 Fund; BRUCE BOUTON, an individual,
9 as Trustee of the AFM and SAG-
10 AFTRA Intellectual Property Rights
11 Distribution Fund; and DOE
12 DEFENDANTS 1-10,

13
14 Defendants.

1 Please take notice that pursuant to L.R. 37-1 and 16-2.7 of the Central District
 2 of California, Plaintiff Kevin Risto (“Plaintiff”) hereby lodges with the Court physical
 3 copies of the following depositions, which are marked in blue with Plaintiff’s
 4 designations and in red with Defendants’ counter designations and annotated with any
 5 objections.

- 6 1. Deposition Transcript of Bruce Carlyle Bouton, dated October 21, 2020;
- 7 2. Deposition Transcript of Duncan Crabtree-Ireland, dated August 29,
- 8 2019;
- 9 3. Deposition Transcript of Duncan Crabtree-Ireland, dated February 16,
- 10 2021;
- 11 4. Deposition Transcript of Duncan Crabtree-Ireland, dated February 17,
- 12 2021;
- 13 5. Deposition Transcript of Tino Gagliardi, dated October 9, 2020;
- 14 6. Deposition Transcript of Kristina Gorbacsov, dated October 23, 2020;
- 15 7. Deposition Transcript of Raymond Hair, dated February 24, 2021;
- 16 8. Deposition Transcript of Raymond Hair, dated February 25, 2021;
- 17 9. Deposition Transcript of Jon Joyce, dated August 27, 2019;
- 18 10. Deposition Transcript of Jon Joyce, dated September 22, 2020;
- 19 11. Deposition Transcript of Jennifer LeBlanc, dated July 23, 2020;
- 20 12. Deposition Transcript of David Nolte, dated April 27, 2021;
- 21 13. Deposition Transcript of John Painting, dated October 29, 2020;
- 22 14. Deposition Transcript of Julie Sandell, dated December 9, 2020;
- 23 15. Deposition Transcript of Stefanie Taub, dated October 20, 2020; and
- 24 16. Deposition Transcript of Stefanie Taub, dated January 20, 2021;

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1 An index to these designations is filed concurrently herewith as **Exhibit A**.

2
3 DATED: June 28, 2021

KIESEL LAW LLP

4
5 By: /s/ Mariana A. McConnell

6 Paul R. Kiesel

7 Mariana A. McConnell

8 Nico L. Brancolini

KIESEL LAW LLP

9 Neville L. Johnson

10 Daniel Lifschitz

JOHNSON & JOHNSON LLP

Attorneys for Plaintiff and the Class

EXHIBIT A**INDEX**

Plaintiffs' Deposition Designations:

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21:22 – 23		48:14 – 50:1
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22:13 – 21		62:2 – 7
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26:15 – 27:1		86:12 – 16
27:7 – 28:13		87:23 – 88:11
28:1 – 29:5		94:22 – 95:11
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30:16 – 31:6		
31:9 – 31:20		
31:23 – 25		
33:23 – 35:13		
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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter- Designated Deposition Testimony
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40:12 – 23		
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41:21 – 25		
42:6 – 16		
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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
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83:25 – 84:1		
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94:11 – 21		
Name of Witness: Duncan Crabtree-Ireland (August 29, 2019)		
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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter- Designated Deposition Testimony
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36:12 – 20		146:23-147:4
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51:13 – 52:12	Calls for legal conclusion	
52:18 – 53:11		
55:23 – 56:12		
65:23 – 66:13		
78:19 – 81:11	Lacks personal knowledge. Response is therefore irrelevant.	
82:2 – 84:5		
86:20 – 22		
87:6 – 88:20		
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136:3 – 25		
137:12 – 139:1		
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144:5 – 146:22		
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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
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Name of Witness: Duncan Crabtree-Ireland (February 16, 2021)		
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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
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73:17 – 24		
74:12 – 21		
75:4 – 25	Vague	
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83:8 – 17		
86:15 – 88:21		
89:1 – 90:16		
91:4 – 25		
92:13 – 93:18		
94:22 – 95:5		
96:1 – 102:16		
106:9 – 107:11		
108:11 – 109:23		
110:6 – 18		
111:16 – 112:7	Vague, broad, incomplete hypothetical	
112:12 – 113:1		

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
113:19 – 114:24		
116:1 – 118:18		
119:23 – 120:4		
122:2 – 127:21	Same objections	
127:24 – 128:9		
128:11 – 18		
129:14 – 133:10		
134:21 – 135:12		
139:5 – 16	Form. Lacks foundation.	
139:21 – 141:9		
143:20 – 144:21		
145:2 – 9		
149:14 – 150:3		
151:17 – 154:23		
156:11 – 161:24	Form. Misstates testimony. Misstates facts in the record, and vague.	
162:6 – 163:10		
164:6 – 165:22	A-C privileged	
166:1 – 168:20		
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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
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187:7 – 188:4		
188:23 – 192:2		
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204:4 – 211:15		
212:15 – 214:25	Vague and overbroad	
215:11 – 218:5		
220:5 – 222:18	Form. Document speaks for itself.	
222:25 – 223:11		
226:3 – 227:2		
227:18 – 229:2		
229:10 – 23	Vague and overbroad	
230:1 – 16		
232:17 – 239:25		
241:22 – 245:14	Vague. Lacks foundation.	
Name of Witness: Duncan Crabtree-Ireland (February 17, 2021)		
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11:24 – 13:11		10:4-23
14:13 – 20		14:8-12
20:13 – 21:22		18:4-19
22:2 – 17		19:1-18
24:23 – 27:1		20:9-12
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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
30:15 – 31:11	Vague	31:12-13
31:15 – 32:14		32:15-33:21
33:22 – 34:9		64:13-65:2
34:24 – 35:12		66:4-67:7
38:20 – 40:7		76:22-77:16
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63:12 – 64:12		
67:20 – 68:21		
70:18 – 73:19		
76:16 – 19	Overbroad. Lacks Foundation	
77:18 – 78:9		
78:21 – 81:14		
82:19 – 86:25		
87:16 – 98:16		
Name of Witness: Tino Gagliardi (dated October 9, 2020)		
9:5 – 11		21:19-22
20:13 – 22		43:22-44:14
20:24 – 21:18		55:23-56:2
21:23 – 22:4		57:21-23
22:24 – 24:5		58:9-18
24:18 – 25:7		60:20-23

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
27:25 – 28:20		61:2-7
29:10 – 30:12		61:11-19
30:15 - 21		68:6-18
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36:7 – 37:8		
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39:21 – 39:25		
40:6 – 20		
41: 3 – 5		
41:9 – 42:14		
42:23 – 43:4		
49:3 – 50:16		
50:18 – 25		
51:3 – 5		
51:7 – 12		
52:16 – 53:15		
53:22 – 54:12		
54:14 – 55:11		
55:15 – 20		

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
58:20 – 59:18		
60:8 – 21		
72:23 – 73:10		
73:12 – 19		
77:25 – 78:1		
78:14 - 22		
79:2 – 12		
79:16		
79:18 – 19		
80:4 – 20		
82:8 – 25		
83:23 – 84:1		
95:14 – 17		
95:23 – 96:25		
97:6 – 8		
99:23 – 100:1		
100:9 – 101:4		
102:2 – 8		
102:22		
103:25 – 104:18		
106:7 – 13		
106:22 – 107:4		
110:9 – 15		
111:15 – 24		

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
112:15 – 114:4		
114:9 – 115:16		
116:20 – 116:22		
118:2 – 8		
118:11 – 22		
118:25 – 119:3		
Name of Witness: Kristina Gorbacsov (October 23, 2020)		
6:20 – 25		50:17-52:1
14:5 – 36:5		55:9-19
47:20 – 50:15		113:4
54:2 – 55:8		114:5-17
67:18 – 68:17		118:20-119:11
72:1 – 2		128:3-11
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74:3 – 82:7		142:6-22
83:6 – 87:18		148:17-149:1
88:4 – 92:6		
92:19 – 93:24		
94:1 – 96:25		
97:10 – 16		
98:2 – 24		
100:8 – 13		
105:10 – 106:12		
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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
110: 2 – 10		
110: 22 – 111:4	Incomplete hypothetical. Calls for speculation.	
111:9 – 112:25	Outside the scope of the designated topics.	
113:5 – 21		
114:19 – 117:18		
117:21 – 118:18		
119:22 – 125:9		
126:3 – 128:2		
130:5 – 131:7		
131:15 – 134:8		
136:22 – 24	Calls for legal conclusion. Outside the scope of topics. Vague and ambiguous as to “sunk costs.”	
137:5 – 12	Vague as to sunk costs, in addition to previous objections.	
137:17 – 19		
144:13 – 14	“Same objections.”	
144:18 – 146:8		
149:5 – 7	“Same objections.”	
149:12 – 18		

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
151:22 – 25	Outside of the designated testimony. Calls for a legal conclusion. Asked and answered.	
152:6 – 14	Outside of the designated testimony. Calls for a legal conclusion. Asked and answered.	
152:20 – 153:6	“Form.”	
153:8 – 22		
154:1 – 158:20		
158:23 – 159:1	Outside of the designated testimony. Calls for a legal conclusion. Lacks foundation. Asked and answered.	
159:7 – 160:23		
161:7 – 162:19	Outside the scope of designated testimony and calls for a legal conclusion.	
162:25 – 163:13	Outside the scope of designated testimony. Calls for a legal conclusion. Asked and answered.	

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
163:19 – 24		
Name of Witness: Raymond Hair (February 24, 2021)		
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22:16 – 23:4		61:1 – 4
23:19 – 24:16		86:13 - 25
28:2 – 29:3	Form. Vague.	87:8 – 12
33:8 – 21		100:4 – 101:14
34:1 – 13		107:12 – 16
37:2 – 20		109:23 – 110:10
38:17 – 20		152:6 – 7
44:13 – 23		161:1 – 16
45:14 – 46:1		162:13 – 21
46:24 – 48:22		174:2 – 15
53:15 – 24	Form. Vague.	185:13 – 19
56:21 – 57:8		186:3 - 6
57:10 – 14	Calls for legal conclusion.	199:12 – 23
57:17 – 18		211:19 – 21
57:20 – 24	Calls for legal conclusion. Misstates record.	224:5 – 10
58:2 – 8	Same objections. Calls for legal conclusion.	225:20 – 24
58:11 – 15		
58:17 – 18	Vague. Calls for legal conclusion.	

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
58:21 – 59:3		
59:6 – 21		
60:13 – 14		
60:16 – 17		
60:19 – 25		
61:17 – 62:10	Form.	
62:12 – 18	Vague as to “lobbying”	
62:21 – 63:4		
63:6 – 64:1		
65:20 – 24		
66:3 – 6		
66:16 – 67:6		
69:13 – 15	Calls for legal conclusion. Vague as to “fiduciary duties.”	
69:20 – 25		
74:19 – 75:2	Vague.	
76:5 – 16		
85:20 – 86:12		
87:1 – 7		
88:7 – 15		
90:4 – 12		
90:16 – 20		
91:4 – 8		

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
92:4 – 9	Vague.	
92:11 – 24		
95:13 – 16	Form.	
95:18 – 20		
96:2 – 5		
102:1 – 2	Form. Lacks foundations.	
102:6 – 10		
102:12 – 18		
103:15 – 16	Vague.	
103:18 – 104:1		
104:12 – 17		
105:23 – 106:5		
106:9 – 10	Form. Calls for legal conclusion. Vague.	
106:14		
106:16 – 17		
106:19 – 23		
106:25 – 107:2	Form.	
107:4 – 10	Same objections.	
107:17 – 21		
110:11 – 24	Vague.	
111:1 – 4		
112:15 – 20		
112:22 – 113:11	Form. Vague. Calls for legal	

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
	conclusion.	
113:22		
114:11 – 13	Same objections. Vague, lacks foundation, and calls for a legal conclusion.	
114:16 – 19		
114:21 – 25	Form. Overbroad and vague. Lacks foundation.	
115:6 – 117:19		
124:8 – 128:21	Vague as to “new performer.”	
128:24		
129:2 – 4	Same objection.	
129:6		
146:7 – 25	Vague.	
147:3 – 9	Form. Lacks foundation. Vague.	
147:12 – 14		
147:16 – 20		
148:12 – 149:25		
150:5 – 24		
151:2 – 4	Form. Lacks foundation. Calls for speculation.	
151:7 – 13	Vague.	

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
151:15 – 23	Misstates testimony.	
152:1 – 5	Vague.	
152:9 – 153:2	Form. Lacks foundation and calls for speculation.	
153:5 – 14	Form. Vague.	
153:16 – 20		
155:8 – 12	Form. Vague.	
155:14 – 18		
155:20 – 156:15	Form. Vague.	
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156:22 – 158:13		
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161:17 – 162:1	Form. Vague. Lacks foundation.	
162:4		
162:24 – 163:4		
163:20 – 164:4	Form.	
164:7-19		
164:21 – 165:21	Form. Vague.	
165:24 – 166:1		
166:15 – 18	Form. Vague.	
166:24		
167:2 – 6	Form. Vague as to “audit”	
167:11 – 24	Form. Overbroad and vague.	

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
168:2 – 11		
168:13 – 169:17	Form. Vague. Lacks foundation.	
171:9 – 17		
171:20 – 172:20		
172:22 – 173:24		
174:16 – 20	Same objections.	
174:22 – 175:3		
175:5 – 9	Form. Vague. Argumentative.	
175:12 – 16		
175:18 – 178:21	Form. Vague and ambiguous as to “tax” and “actual cost.” Argumentative. Lacks foundation.	
179:3 – 25		
180:4		
180:7 – 12	Lacks foundation. Misstates facts in record.	
180:16 – 181:3	Argumentative.	
181:5 – 17	Asked and answered.	
181:20 – 182:1		
182:6 – 11	Form. Lacks foundation.	
182:14		

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
184:23 – 185:12		
186:7 – 12	Form.	
186:14 -16		
186:18 – 19		
186:21 – 188:2	Form.	
189:23 – 190:25		
191:6 – 24	Argumentative.	
192:1 – 4		
192:18 – 193:3	Form. Mischaracterizes testimony.	
193:6 – 8		
193:24 – 194:7		
195:10 – 23	Vague. Argumentative.	
196:1 – 9	Form. Lacks foundation.	
196:12 – 197:15	Form. Lacks foundation.	
197:18 – 198:14	Vague. Lacks foundation.	
198:17		
199: 1 – 11		
199:24 – 200:25		
205:2 – 12		
207:7 – 13	Form. Document speaks for itself.	
207:16 – 24		
209:4 – 15		

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
210:12 – 15	Overbroad. Lacks foundation.	
210:18		
210:20 – 22	Same objections.	
210:24		
211:10 – 12	Overbroad.	
211:14 – 18	Same objections. Overbroad and vague.	
213:7 – 18		
214:15 – 22		
215:12 – 217:20		
219:2 – 220:25		
221:7 – 222:1		
222:9 – 13		
224:1 – 4	Form. Asked and answered and vague. Lacks foundation.	
224:11 - 15	Same objections. Vague.	
225:1	Vague and mischaracterizes the testimony of those individuals.	
225:6 – 7		
225:9 – 19		
227:14 – 228:16	A-c Privileged	
228:19 – 229:2	Form.	

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
229:4 – 231:13		
231:16 – 232:11	Calls for a legal conclusion. Vague. Misstates testimony.	
Name of Witness: Raymond Hair (February 25, 2021)		
7:17 – 19		64:25 – 65:3
8:11 -21		66:15 – 20
12:2 – 9		77:12 – 19
12:13 – 13:13		98:6 – 7
13:15 – 15:13		
16:3 – 17		
25:11 – 27:17	Form.	
27:19 – 21		
30:21 – 31:11		
32:6		
32:17 – 33:8		
33:11 - 22		
33:24 – 34:12	Form. Misstates testimony.	
40:3 – 23		
45:10 – 14		
45:19 – 48:20	Form.	
48:23 – 24	“There was lengthy 30b6 testimony but another designee witness on the provision of data from the	

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
	union...and I don’t think Mr. Hair was designated on that topic, although I don’t have an objection to him answering based on his personal knowledge.”	
49:18 – 50:7		
52:7 – 53:23	Form. Calls for legal conclusion.	
54:1 – 57:20		
58:9 – 16		
58:21 – 22	Form. Vague.	
58:24 – 59:10		
59:13 – 22	Form. Vague and overbroad.	
59:25 – 60:8	Form. Vague. Overbroad.	
60:11 – 22		
60:24 - 25	Form. Vague as to “compensation.”	
61:3 – 62:7	Vague and overbroad.	
62:10 – 17	Form. Vague and overbroad.	
62:20 – 24	Form. Vague and overbroad.	
63:2 – 4		
63:6 – 9	Form. Vague and overbroad.	
63:13 – 21		

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
63:23 – 64:24	Form. Calls for a legal conclusion. Overbroad.	
65:5 – 11	Form. Vague. Calls for a legal conclusion.	
65:14 – 24	Same objections.	
66:1 – 7	Same objections.	
66:9 – 14	Calls for a legal conclusion. Overbroad.	
66:25 – 67:15		
69:17 – 20	Same objections.	
69:22 – 24		
70:5 – 17		
71:4 – 6	Overbroad as to “data.” Vague.	
71:10 – 22		
71:24 – 72:9		
72:19 – 74:9		
74:20 – 22	Same objections. Calls for a legal conclusion.	
75:1 – 12		
75:19 – 21	Form. Overbroad and vague.	
75:24		
76:6 – 77:11		
77:20 – 23	Same objection.	

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
77:25		
78:5 – 10		
78:12 – 79:11	Form. Calls for a legal conclusion.	
79:14		
82:22 – 24	Same objections. Calls for a legal conclusion. Lacks foundation.	
83:4 – 6	Same objections. Calls for a legal conclusion. Lacks foundation.	
83:9 – 10		
83:12 – 20	Outside the scope. Calls for a legal conclusion. Lacks foundation.	
84:3 – 15	Form. Lacks foundation and calls for a legal conclusion.	
84:18 – 85:7		
87:3 – 12		
87:14 – 20		
87:25 – 88:4	Form. Calls for a legal conclusion.	
88:7		
90:4 – 22	Vague. Calls for speculation.	

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
	Calls for a legal conclusion.	
91:22 – 92:5		
96:19 – 97:14	Form. Vague.	
97:21 – 98:3		
98:8 – 99:25		
Name of Witness: Jon Joyce (August 27, 2019)		
12:3 – 13		22:1-23
14:12 – 16		23:9-17
23:18 – 29:25		56:12-19
30:21 – 31:19		57:2-9
32:3 – 34:25		57:18-58:24
35:4 – 5		144:19-145:6
35:9 – 36:13		146:15-24
36:17 – 37:6		154:17-18
36:22 – 42:18		
43:5 – 44:25		
45:3 – 46:16		
51:12 – 54:18		
61:21 – 62:12		
62:24 – 63:11		
68:17 – 69:21		
71:6 – 74:4		
76:11 – 77:2		
83:16 – 85:25		

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
86:6 – 87:17		
88:1 – 10		
88:24 – 89:3		
89:6 – 89:23		
140:1 – 8		
140:16 – 141:19		
141:22 – 142:8		
142:21 – 144:18		
145:8 – 146:14		
147:12 – 148:8		
148:12 – 149:18		
149:20 - 23		
150:3 - 13		
150:20 – 151:25		
152:4 – 14		
152:21 – 154:15		
155:2 – 19		
155:25 – 158:14		
158:20 – 159:18		
160:7 – 163:20		
163:23 – 164:11		
164:13 – 22		
175:2 – 7		
178:20 – 21		

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
179:3 – 180:12		
189:7 – 190:18		
194:14 – 198:15		
234:25 – 235:3		
239:7 – 240:9		
246:4 – 247:6		
284:5 – 286:15		
289:21 – 292:24		
293:1 – 294:25		
296:8 – 11		
299:8 – 300:22		
301:2 – 11		
317:24 – 320:9		
320:20 – 321:14		
338:2 – 7		
338:15 – 339:13		
339:17 – 19		
Name of Witness: Jon Joyce (September 22, 2020)		
8:20 – 22		23:16-22
11:18 – 22		24:18-20
17:21 – 18:20		33:12-34:2
19:9 – 20:8		36:19-20
21:14 – 25		36:24-37:1
22:5 – 23:1		41:1-10

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
23:8 – 12		42:9-22
23:23 – 24		45:18-46:7
24:1 – 17		50:22-51:6
24:23 – 25:14		90:9-17
25:18 – 26:5		94:12-95:2
26:13 – 27:7		
27:22 – 28:11		
28:20 – 25		
29:6 – 11		
30:17 – 31:9		
31:17 – 32:2		
32:7 – 16		
34:4 – 36:18		
37:10 – 18		
38:22 – 40:25		
41:11 – 24		
42:2 – 8		
43:2 – 13		
44:8 – 45:17		
46:13 – 47:9		
47:16 – 49:8		
53:11 – 54:2		
55:2 – 16		
57:17 – 25		

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
63:4 – 64:24		
69:18 – 71:14		
72:14 – 74:11		
74:16 – 75:3		
75:5 – 8		
75:10 – 76:25		
77:11 – 78:6		
79:23 – 80:7		
80:23 – 81:18		
83:2 – 84:3		
84:5 – 8		
86:2 – 87:8		
87:11 – 24		
88:19 – 22		
88:24 – 89:24		
90:2 – 8		
92:2 – 20		
92:22 – 94:11		
95:15 – 19		
95:25 – 96:2	Argumentative	
96:4 – 16		
96:20 – 25		
97:8 – 12		
97:14 – 24		

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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
98:1 – 18		
99:9 – 23		
Name of Witness: Jennifer LeBlanc (July 23, 2020) – JOINT DESIGNATION		
6:16 – 20		26:5-28:7
21:14 – 25:4		30:9-22
25:11 – 26:4		33:18
28:8 – 29:2		33:25-34:4
29:9 – 22		34:16-19
30:2 – 8		39:21-41:17
32:1 – 33:12		43:17-44:6
33:17		44:11-24
33:20 21		45:16-18
35:8 – 24		46:4-6
36:2 – 15		59:25-60:5
42:22 – 23		63:17-64:2
43:4 – 8		64:9-65:5
47:16 – 49:15		69:20
49:17 – 50:18		81:5-9
50:22 – 24		81:11-12
51:1 – 52:16		98:12-99:4
52:21 – 56:19		99:7
56:23 – 57:25		99:9-11
58:3 – 21		100:1-2
58:23 – 59:4		100:17-20

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter-Designated Deposition Testimony
59:7 – 9		100:24-101:5
59:13 – 16		101:9-22
61:3 – 17		102:3
62:1 – 2		102:6-103:5
62:8 – 63:2		103:10-13
65:6 – 20		103:16-104:11
66:5 – 19		104:21-108:6
67:5 – 8		108:21-109:21
67:10 – 68:6		110:1-111:2
68:10 – 21	Improper lay opinion. Relevance.	111:21-112:14
68:24 – 69:13		114:17-115:2
69:21 – 24		115:22-116:1
70:1 – 71:23	Hearsay. Hearsay within hearsay. Lack of foundation and speculation as to Ms. Taub’s view of AFM’s position. Ms. Taub’s lay opinion is irrelevant and inadmissible.	116:20-117:8
73:10 – 74:8		126:1-21
76:23 – 77:1		140:13-20
77:13 – 16		142:3-144:12
77:19 – 79:8		151:4-18

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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
79:12 – 81:2		
81:14 – 85:24		
92:22 – 93:15		
93:19 – 94:13		
94:16 – 17		
122:1 – 3		
122:6 – 21		
122: 25 – 123:4		
129:5 – 130:3		
145:16 – 21		
145:23 – 24		
146:1 – 25		
147:8 – 11		
147:14 – 23		
147:25 – 148:3		
151:21 – 23		
152:2 – 153:13	Hearsay. Hearsay within hearsay. Lack of foundation and speculation as to Ms. Taub's view of AFM's position. Ms. Taub's lay opinion is irrelevant and inadmissible.	
153:16		

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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
154:2 – 12		
154:17 – 19		
154:22 – 155:3		
155:7 – 9		
155:12 – 14		
155:16 – 17		
155:20 – 24		
156:5 – 6	Lay opinion. Relevance.	
156:9 – 13		
156:16 – 20		
156:22 – 23		
Name of Witness: David Nolte (April 27, 2021) (Defendant's Expert)		
6:15 – 19		
34:20 – 35:11		
44:2 – 21		
45:5 – 50:19		
51:3 – 52:10		
52:12 – 21		
55:19 – 21		
55:23		
56:8 – 57:18		
57:20 – 59:18		
59:20 – 64:4		
64:18 – 66:22		

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
66:25 – 68:14		
68:25 – 74:14		
76:17 – 20		
78:3 – 15		
79:22 – 80:2		
81:3 – 82:3		
82:5 – 11		
82:13 – 83:6		
83:10 – 14		
83:16 – 17		
83:20 – 23		
83:25 – 84:1		
84:3 – 8		
84:10 – 15		
84:19 – 20		
84:22 – 87:12		
87:24 – 88:25		
89:10 – 15		
89:23 – 90:5		
90:23 – 91:1		
91:3		
92:21 – 93:11		
93:13 – 22		
95:15 – 17		

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
98:23 – 99:19		
99:25 – 100:6		
100:24 – 101:17		
102:9 – 11		
102:13 – 19		
102:22 – 103:10		
103:13 – 104:2		
104:9 – 18		
104:23 – 105:22		
106:1 – 14		
106:17 – 107:6		
107:8 – 110:3		
110:5 – 115:25		
116:6 – 117:4		
117:16 – 17		
117:19 – 20		
117:22 – 118:19		
118:22 – 119:7		
119:20 – 121:8		
122:15 – 123:21		
124:18 – 126:11		
128:1 – 132:12		
133:10 – 135:13		
135:15 – 136:21		

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
137:4 – 142:22		
144:25 – 145:24		
146:8 – 13		
146:25 – 151:18		
152:9 – 153:13		
154:1 – 2		
154:4 – 7		
154:10 – 19		
155:3 – 10		
156:1 – 2		
156:4 – 14		
156:16 – 157:20		
157:22 – 25		
158:3 – 14		
158:16 – 159:6		
159:9 – 160:5		
160:9 – 19		
160:21 – 161:4		
161:7 – 164:11		
165:7 – 12		
165:24 – 175:21		
175:23 – 176:16		
177:18 – 180:9		
183:1 – 187:14		

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
187:23 – 25		
188:3 – 21		
188:23 – 189:21		
192:19 – 193:9		
194:24 – 25		
195:6 – 7		
195:11 – 22		
195:25 – 196:6		
196:9 – 18		
197:5 – 7		
197:9 – 11		
197:13 – 21		
198:7 – 10		
198:14 – 200:7		
202:8 – 203:6		
203:9 – 204:16		
205:2 – 12		
208:3 – 11		
208:13 – 20		
208:22 – 209:22		
209:24 – 210:1		
210:9 – 23		
212:1 – 214:6		
214:8 – 217:25		

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
218:19 – 219:16		
219:19 – 220:9		
220:11 – 12		
220:14 – 221:1		
221:3 – 225:15		
225:19 – 23		
225:25 – 226:2		
226:5 – 11		
226:14 – 227:3		
227:13 – 229:9		
229:14 – 230:2		
Name of Witness: John Painting (October 29, 2020)		
6:16 - 19		44:7-19
13:16 – 20		50:8-17
14:4 – 17		59:25-60:11
15:6 – 16:24		94:4-10
17:4 – 9		
17:15 – 19:15	“Database” is vague and ambiguous “and that’s going to hold true for each of the subsequent references to the term database in each of the subsequent topics as well.”	
19:22 – 35:3		

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter-Designated Deposition Testimony
44:4 – 6		
44:20 – 46:17		
46:24 – 47:1	Vague as to “information in paragraph 1.”	
47:4 – 48:25		
49:2 – 22	Outside the scope of designated topics.	
50:2 – 6		
50:18 – 51:23		
52:12 – 53:22		
54:14 – 21		
54:23 – 57:19		
58:5 – 59:24		
60:23 – 61:11		
61:19 – 65:20		
66:11 -13	Vague as to “this amount of time”	
66:16 – 25		
67:3 – 69:19	Asked and answered.	
69:21 – 23		
70:14 – 71:5		
71:7 – 8	Mischaracterizes testimony.	
71:11 – 12		
71:14 – 72:10	Outside the scope of	

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Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
	designated testimony.	
72:13 – 16		
72:20 – 73:15		
75:3 – 76:23		
80:2 – 81:22		
81:24 – 82:3	Overbroad.	
82:5 – 24		
83:2 – 12	Mischaracterizes testimony.	
83:15 – 17		
83:19 – 21	Outside the scope of designated testimony. Vague.	
83:24 – 84:5		
84:9 – 15	Vague as to “involved in that process.”	
84:23 – 86:16	“Vague as to ‘disproportionate.’ Mischaracterizes the witness’ testimony with respect to the 15 to 20 percent figure.”	
86:21 – 89:18	Vague as to “other locals”	
89:21 – 90:15	“Vague as to number of requests. Vague as to what a request is.”	

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
90:19 – 92:2	Vague as to “requests”	
92:5 – 93:21	Asked and answered. Calls for speculation.	
93:24 – 94:3		
94:12 – 13	Vague as to “requests.”	
94:16 – 99:15	Vague as to “covered by the AFM”	
99:18 – 100:5		
101:12 - 15	Vague as to “requests”	
101:18 – 104:17	Vague. Overbroad.	
104:19 – 105:12	Vague. Asked and answered. Calls for speculation.	
105:15 – 109:25		
111:5 – 15	Vague.	
111:17 – 113:4		
113:8 – 114:8	Mischaracterizes the witness’ testimony.	
114:11 – 20	Mischaracterizes the witness’ testimony.	
114:23 – 115:15		
115:17 – 118:18	Outside the scope of designated testimony.	
118:21 – 120:18	Vague as to “database”	
120:22 – 121:4		

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
123:4 – 7	Outside the scope of designated testimony. Calls for a legal opinion. Vague and ambiguous. Asked and answered.	
123:11 - 24		
124:2 – 4	Outside the scope of designated testimony. Vague and ambiguous.	
124:7		
124:9 -10	Outside the scope of designated testimony. Vague and ambiguous.	
124:13		
124:15 – 126:24		
127:1	Vague.	
127:3		
127:5 – 6	Vague.	
127:8 – 10		
127:12 – 16	Vague. Outside the scope of designated testimony.	
127:19 – 128:2		
129:23 – 24		
130:2 – 4	Vague. Ambiguous and	

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
	argumentative as to “reasonable services.” Outside the scope of the designated testimony. Calls for expert testimony. Calls for a legal opinion.	
130:9 – 23		
131:3 – 10	Vague and ambiguous and argumentative as to “reasonable cost.” Outside the scope of the designated testimony. Calls for expert testimony. Calls for a legal opinion. Asked and answered.	
131:15 – 18		
131:20 – 23	Outside the scope of designated testimony. Vague and ambiguous. Asked and answered.	
132: 2 – 24		
133:2 – 134:8	Vague.	
134:10 – 19		
134:22 – 135:2	Outside the scope of	

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
	designated testimony. Asked and answered.	
135:5 – 22	Outside the scope of designated testimony. Asked and answered. Vague and ambiguous.	
136:1 – 14	Vague and ambiguous as to “the work.” Outside the scope of designated testimony. Vague and ambiguous. Asked and answered.	
136:19 – 137:7		
137:10 – 12	Asked and answered.	
137:14 – 24	Vague and ambiguous as to “reasonable cost of the work performed.” Outside the scope of designated testimony. Calls for legal opinion. Calls for expert testimony. Asked and answered, bordering on harassing.	
138: 5 – 16		
139:15 – 17	Vague and ambiguous as to	

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
	the “amount of work performed.” Calls for a legal opinion. Calls for expert testimony. Outside the scope of designated testimony. Asked and answered.	
139:23 – 140:1	Asked and answered. Harassing the witness.	
140:4 – 5		
140:7 – 10	Vague and ambiguous as to “reasonable costs.” Argumentative as to reasonable cost. Asked and answered. Outside the scope of designated testimony. Calls for a legal opinion. Calls for expert testimony.	
140:16 – 23	Outside the scope of designated testimony. Vague and ambiguous as to “reasonable value.” Calls for a legal opinion. Calls for expert testimony. Asked and answered. Harassing.	

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
141:4 – 6		
141:21 – 142:4	Outside the scope of designated testimony. Calls for legal opinion. Calls for expert testimony. Vague and ambiguous. Asked and answered. Harassing.	
142:9 – 10		
142:21 – 144:25		
Name of Witness: Julie Sandell * subject to additional designations after 6/29/21 deposition		
7:21 – 23		18:6 – 24
19:1 – 22	Form. Vague.	39:23 – 41:7
20:1 – 21	Vague.	51:12 – 52:4
20:24 – 21:16	Form. Vague.	65:13 – 66:24
33:19 – 35:17		
36:3 – 39:22	Form. Vague.	
52:6 – 53:25		
70:21 – 72:18	Overbroad. Vague.	
Name of Witness: Stefanie Taub (October 20, 2020)		
6:10 – 14		19:9 – 13
18:13 – 19:7		54:12 – 23
19:14 – 20:15		109:23 – 25
21:13 – 24	Overbroad.	142:4 – 143:13

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
22:3 – 4		
24:17 – 26:11		
38:15 – 39:2	Vague.	
39:4 – 40:19	Overbroad. Vague.	
40:22 – 43:8		
43:12 – 44:21	Form.	
44:22 – 45:24	Form. Lacks foundation.	
46:2 – 47:20	Overbroad. Vague.	
47:23 – 24		
48:4 – 7	Overbroad.	
48:10		
48:13 – 24		
49:2 – 15	Lacks foundation. Overbroad.	
49:18 – 50:25	Lacks foundation. Overbroad.	
51:4 – 52:22	Lacks foundation. Overbroad.	
52:25 – 53:24		
55:13 – 61:25		
65:4 - 66:10	Form. Misstates testimony.	
66:13 – 70:16		
72:4 – 74:2	Lacks foundation. Overbroad.	

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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
74:25 – 75:16	Lacks foundation. Overbroad.	
75:18 – 24		
76:1 – 10	Lacks foundation. Overbroad.	
76:13 – 18	Lacks foundation. Overbroad.	
76:21 – 77:20	Overbroad. Vague.	
77:23 – 24		
78:1 – 81:1	Overbroad. Vague.	
81:5 – 82:4		
85:3 – 4		
85:7 – 87:2	Misstates testimony. Vague.	
87:5 – 11	Overbroad. Vague.	
87:15 – 88:3	Lacks foundation. Overbroad. Vague.	
88:6 – 15		
89:10 – 17	Asked and answered.	
89:20 – 93:8	Form. Misstates testimony.	
93:12 – 95:12	Lacks foundation. Overbroad. Vague.	
95:15 - 97:11	Ambiguous. Vague.	
97:14 – 98:5	Overbroad. Vague.	
98:8 – 99:16		

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
100:18 – 103:7		
103:9 – 106:24		
107:10 – 109:22		
116:9 – 119:12		
128:10 – 19	Overbroad. Vague.	
128:22 – 130:5		
131:5 – 16	Form. Vague.	
131:20 – 132:6	Argumentative. Asked and answered.	
132:9 – 133:2	Lacks foundation. Vague.	
133:6 – 15	Lacks foundation. Vague.	
133:18 – 134:1	Misstates testimony. Vague.	
134:4 – 19	Overbroad. Vague.	
134:22 – 135:7	Vague.	
135:11 – 17	Vague.	
135:20 – 24		
136:2 – 9	Vague.	
136:13 – 137:15		
137:20 – 138:9	Form. Vague.	
138:12 – 139:23	Lacks foundation. Vague.	
140:1 – 12	Argumentative. Asked and answered.	
140:15 – 141:1	Overbroad. Vague.	
141:4 – 14	Vague.	

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
141:16 – 22		
144:10 – 148:7	Argumentative. Lacks foundation. Vague.	
148:10 – 20	Calls for speculation.	
148:23 – 149:12	Misstates testimony. Vague.	
149:15 – 150:18	Argumentative. Form. Misstates testimony. Vague.	
150:22 – 152:6	Form. Vague.	
152:9 – 153:24		
154:1 – 6	Misstates testimony.	
154:9 – 155:23	Lacks foundation. Vague.	
156:1		
156:21 – 23	Vague.	
156:25 – 157:8		
157:11 – 14	Vague.	
157:17	Vague.	
157:19 – 21		
157:23 - 24		
158:1 – 12	Form.	
158:16 – 161:2	Vague.	
161:4 – 163:4	Misstates testimony. Vague.	
163:7 – 23	Asked and answered.	
164:1 – 11		

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
165:23 – 166:11	Form. Vague.	
166:14 – 167:19	Calls for speculation. Form. Vague.	
167:22 – 168:18	Vague.	
171:1 – 173:5	Form. Lacks foundation.	
173:8 – 175:12	Form. Vague.	
175:15 - 25		
176:2 - 16		
176:24 – 177:23		
178:1 – 179:15		
182:14 – 16	Calls for speculation. Form. Lacks foundation. Vague.	
182:18 – 183:2	Vague.	
183:4 – 187:7	Form.	
187:11 - 19	Asked and answered. Misstates testimony.	
187:23 – 24		
188: 2 – 4	Form. Lacks foundation. Vague.	
188:7 – 15		
188:25 – 189:7	Lacks foundation.	
189:10 – 191:4	Form.	
191:8 – 192:3	Form.	
192:5 – 6		

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
192:8 – 14		
193:7 – 12	Calls for a legal conclusion. Form. Lacks foundation. Vague.	
193:16 – 23		
193:25 – 194:2	Calls for a legal conclusion. Document speaks for itself. Lacks foundation.	
194:7 – 25		
Name of Witness: Stefanie Taub (January 20, 2021)		
12:1 – 3		29: 14 – 20
23:16 – 25:20	Overbroad. Vague.	47:5 – 13
26:2 – 13	Vague.	56:3
26:15 – 27:18	Assumes facts not in evidence. Lacks foundation.	68:16 – 69:14
27:22 – 28:1		80:23 – 81:8
28:3 – 9	Document speaks for itself. Lacks foundation.	127:4 – 7
29:21 – 32:13	Calls for a legal conclusion. Vague.	130:3 – 13
32:17 – 33:2		131:3 – 4
33:4 – 22		143:2 – 6
34:20 – 37:6	Vague.	172:21 – 173:2
40:10 – 41:8	Vague.	173:6 – 12

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
41:11 - 16	Argumentative. Vague.	183:16 – 184:6
41:19 – 42:5	Vague.	188:19 – 189:9
42:7 – 43:20	Argumentative. Overbroad.	219:23 – 220:17
43:23 – 44:1		
44:3 – 4	Vague.	
44:9 – 23	Argumentative.	
44:25 – 45:6	Argumentative. Overbroad.	
45:9 – 46:3	Overbroad. Vague.	
46:6 – 47:4		
47:10 – 12		
47:15 – 48:24	Vague. Overbroad.	
49:2 – 50:7	Argumentative.	
50:9 – 16	Argumentative.	
50:19 – 51:2	Calls for legal conclusion. Document speaks for itself.	
51:5 – 8	Calls for legal conclusion. Document speaks for itself.	
51:10 – 52:1	Vague.	
52:3 – 9	Argumentative. Vague.	
52:13 – 53:5	Overbroad.	
53:7 – 54:2		
54:20 – 55:2		
55:4	Lacks foundation.	
55:7 – 11		

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
55:19 – 21	Form. Lacks foundation. Vague.	
55:24 – 56:1		
56:4 – 59:5	Calls for speculation. Overbroad. Vague.	
59:9 – 17	Misstates the document.	
59:20 – 60:17	Argumentative. Overbroad. Vague.	
60:20 – 62:22	Argumentative.	
62:24		
63:3 – 65:16	Argumentative. Incomplete hypothetical.	
65:19 – 66:21	Argumentative. Assumes facts not in record. Incomplete hypothetical.	
66:24 – 67:15	Calls for legal conclusion. Outside scope of topics. Vague.	
67:20 – 68:1	Calls for legal conclusion. Outside scope of topics. Vague.	
68:3 – 15		

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
69:18 – 21	Assumes fact not on the record. Calls for legal conclusion. Outside scope of topics. Vague.	
69:24 – 70:2		
70:4 – 22	Vague.	
70:25 – 71:5	Overbroad. Vague.	
71:7 – 16	Calls for legal conclusion. Lacks foundation.	
71:19 – 72:5	Overbroad. Vague.	
72:9 – 20	Mischaracterizes prior testimony.	
72:23 – 73:6	Asked and answered.	
73:9 – 15	Overbroad. Vague.	
73:24 – 75:10	Overbroad. Vague.	
75:11 – 17	Lacks foundation. Overbroad. Vague.	
75:20 – 24	Lacks foundation. Overbroad.	
76:2 – 8	Lacks foundation. Overbroad. Vague.	
76:11 – 17	Lacks foundation. Overbroad. Vague.	
76:19 – 25	Lacks foundation. Overbroad.	

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
	Vague.	
77:2 – 11	Overbroad.	
77:13 – 78:4	Overbroad. Vague.	
78:6 – 8	Lacks foundation. Overbroad. Vague.	
78:11 – 15	Lacks foundation. Overbroad. Vague.	
78:18 – 22	Lacks foundation. Overbroad. Vague.	
78:25 – 79:5		
79:8 – 25		
81:10 – 12	Lacks foundation. Overbroad. Vague.	
81:15 – 82:4	Lacks foundation. Overbroad. Vague.	
82:6		
82:8 - 11	Vague.	
82:13 – 14		
87:7 – 9		
87:13 – 15		
89:3 – 12		
89:14 – 90:12	Lacks foundation.	
90:14 – 23	Form.	
90:25 – 91:18	Lacks foundation. Misstates	

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
	document.	
91:22 – 25		
92:2 – 9	Calls for speculation. Lacks foundation. Misstates document.	
92:12 – 20	Calls for speculation. Lacks foundation. Misstates document.	
92:22 – 93:8	Lacks foundation. Misstates document.	
93:11 – 23	Argumentative. Document speaks for itself.	
94:1 – 20		
94:23 – 95:13		
95:16 – 96:2		
96:5 – 17		
96:19 – 97:4		
97:6 – 13		
97:16 – 98:12		
99:5 – 100:3	Document speaks for itself.	
100:6 – 14	Vague as to time.	
100:16 – 101:2	Argumentative. Misstates testimony.	
101:5 – 13	Asked and answered.	

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
101:16 – 102:4	Incomplete hypothetical. Lacks foundation.	
102:8 – 9	Incomplete hypothetical. Lacks foundation.	
102:16 – 104:8	Asked and answered. Vague.	
104:11		
104:13 – 17	Vague.	
104:20 – 105:7	Calls for speculation. Vague.	
105:10 – 16	Calls for speculation. Incomplete hypothetical. Lacks foundation.	
105:20 – 25	Overbroad. Vague.	
106:3 – 10	Argumentative. Document speaks for itself.	
106:14 – 107:10	Overbroad. Vague.	
107:12 – 24		
108:1	Argumentative.	
108:4 – 9	Form.	
108:11 – 23	Calls for speculation. Incomplete hypothetical. Lacks foundation.	
109:1 – 4	Calls for speculation.	

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
	Incomplete hypothetical. Lacks foundation.	
109:6 – 12	Asked and answered.	
109:15 – 18	Calls for speculation. Incomplete hypothetical. Lacks foundation.	
109:22 – 110:16	Argumentative.	
110:18 – 19		
110:21 – 111:1	Argumentative.	
111:3 – 4		
111:7 – 9	Beyond scope of subpoena notice. Calls for speculation. Incomplete hypothetical. Lacks foundation.	
111:14 – 112:6	Calls for speculation. Incomplete hypothetical. Lacks foundation.	
112:11 – 113:3	Calls for speculation. Incomplete hypothetical. Lacks foundation.	
113:7		
113:16 – 17		
118:20 – 22	Vague.	
118:24		

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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
119:1 – 119:24	Vague.	
120:1 – 4	Lacks foundation.	
120:6 – 16	Lacks foundation. Vague.	
120:19 – 121:19	Vague.	
121:21 – 122:11	Overbroad. Vague.	
122:16 – 123:4	Misstates facts. Vague.	
123:8 – 17	Vague.	
123:8 – 17	Misstates testimony. Vague.	
123:19 – 125:10		
125:13 – 19	Overbroad. Vague.	
125:21 – 126:2		
126:4 – 8	Misstates testimony.	
126:10 – 14		
126:17 – 21		
126:25 – 127:1		
127:11 – 24		
128:20 – 130:2		
130:15 – 20		
130:22 – 23		
130:25 - 131:2		
131:5 – 6	Overbroad. Vague.	
131:8 – 134:7	Lacks foundation. Overbroad. Vague.	
134:9 – 16		

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Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
134:18 – 19		
134:22 – 25		
135:2 – 20		
136:11 – 137:2		
137:21 – 138:3		
144:3 – 25		
145:2	Calls for legal conclusion.	
145:8 – 146:15		
146:19	Calls for legal conclusion. Vague.	
146:21 – 23		
147:1 – 23		
148:1		
148:8 – 149:25	Calls for legal conclusion. Vague.	
150:2 – 151:2	Overbroad. Vague.	
151:5 – 11		
151:14 – 15	Lacks foundation. Vague.	
151:17 – 152:24	Vague.	
153:4 – 154:22		
154:24 – 155:1	Overbroad.	
155:3 – 22	Asked and answered.	
155:25 – 157:14		
157:21 – 25	Vague.	

Plaintiffs' Designated Deposition Testimony	Objections	Defendants' Counter-Designated Deposition Testimony
158:2 – 11	Overbroad. Vague.	
158:13 – 16		
158:18 – 20	Vague.	
158:22 – 159:5		
159:7 – 160:7		
160:23 – 161:12	Vague.	
162:5 – 6		
162:8 – 164:24		
165:3 – 4	Lacks foundation. Outside scope of designated topics. Vague.	
165:6 – 166:18		
166:22 – 167:3		
167:8 – 10	Vague.	
167:25 – 168:19		
168:21 – 23	Vague.	
169:5 – 10	Lacks foundation. Vague.	
169:12 – 170:19		
170:22 – 171:3		
173:3 – 5	Overbroad. Vague.	
173:14 – 21		
173:23 – 174:4		
174:5 – 175:9		
175:19 – 176:1	Argumentative.	

Plaintiffs’ Designated Deposition Testimony	Objections	Defendants’ Counter- Designated Deposition Testimony
176:7 – 21		
176:23 – 177:2		
177:5 – 14		
177:16 – 17		
177:21 – 178:15		
180:4 – 183:15		
184:13 – 188:18		
190:1 – 192:3		
195:6 – 24		
198:5 – 204:14	Outside scope of designated topics.	
205:15 – 206:20	Vague.	
207:2 – 208:7		
208:10 – 12		
208:14 – 212:15	Vague.	
212:25 – 214:18		
214:22 – 219:18		
220:21 – 222:2		

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 28, 2021.

DATED: June 28, 2021

KIESEL LAW LLP

By: /s/ Mariana A. McConnell

Paul R. Kiesel

Mariana A. McConnell

Nico L. Brancolini

KIESEL LAW LLP